

**Amendments to the Drawings:**

The attached replacement drawing sheet makes changes to Fig. 5 and replaces the original sheet with Figs. 5 and 6.

Attachment: Replacement Sheet

**REMARKS**

Claims 1, 3, 4, 6, 7, 9, 10, 12, 13, 15, 16, 18, 19, 21, 22, 24, 25, 27, 28, 30, 31, 33, 34, and 36 are pending in this application. By this Amendment, claims 1, 4, 7, 10, 13, 16, 19, 22, 25, 28, 31 and 34 are amended.

Claims 1, 4, 7, 10, 13, 16, 19, 22, 25, 28, 31 and 34 were rejected under 35 U.S.C. §112, second paragraph. The claims, specification and drawings have been amended responsive to the Examiner's comments. It is therefore requested that the rejection be withdrawn.

Claims 1, 3, 4, 6, 7, 9, 10, 12, 13, 15, 16, 18, 19, 21, 22, 24, 25, 27, 28, 30, 31, 33, 34 and 36 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Bright (U.S. Patent No. 6,897,977) in view of Taubman et al. (non-patent literature "JPEG2000 Image Compression Fundamentals, Standards and Practice," Kluwer Academic Publishers, November 2001). The rejection is respectfully traversed.

With respect to independent claim 1 and for similarly recited features in independent claims 13, 16 and 25, Bright fails to teach an image processing method for encoding an image, comprising: dividing the input image into one or more square areas, the number of pixels contained in one side of each square area being  $(2^N) + 1$  (where N is a natural number).

The Examiner broadly asserts that Taubman et al. teaches this limitation (Chapter 15.6.3, pages 611-612, first through third paragraphs), however the Applicant respectfully disagrees. While Taubman may teach square tiles, the size of which being  $(2^N) + 1$ , there is no motivation for combining the teachings of Taubman with Bright. The Examiner's motivation for combining Taubman and Bright is incorrect because neither Bright nor the claimed invention have overlapping tiles and, therefore, do not introduce quantization errors at tile boundaries. Therefore, the Examiner's motivation to combine does not exist because one skilled in the art would not have looked to Taubman for a teaching of tile size

when the reference being modified does not have overlapping tiles and, therefore, does not require a method of reducing quantization induced errors at tile boundaries.

Therefore, because Bright does not contain all the claimed limitations and because there is no motivation for combining Taubman and Bright, we submit that the rejection of claim 1 under 35 U.S.C. §103(a) is in error.

With respect to independent claims 4 and similarly recited in features in independent claim 28, Bright does not teach a recursive method of decoding image data by combining square areas where the number of pixels contained in one side of each square is  $(2^N) + 1$ . For the reasons mentioned above with respect to claim 1, there is no motivation for combining Taubman and Bright because Bright has no "quantization induced errors at tile boundaries" which would require the methods taught by Taubman. Therefore, there is no motivation for using a tile size of  $(2^N) + 1$  as taught by Taubman in Bright, and therefore the rejection under 35 U.S.C. §103(a) is in error.

With respect to claim 7, Bright does not teach transforming the input non-square image into a square image, the number of pixels contained in one side of the square image being  $(2^N) + 1$  (where N is a natural number). For the reasons mentioned above with respect to claim 1, there is no motivation for combining Taubman and Bright because Bright has no "quantization induced errors at tile boundaries" which require the methods taught by Taubman. Therefore, there is no motivation for using a tile size of  $(2^N) + 1$  as taught by Taubman in Bright, and therefore the rejection under 35 U.S.C. §103(a) is in error.

With respect to independent claims 10 and for similarly recited features in independent claims 19, 22, 31 and 34, Bright does not teach combining a square image on the basis of the combined triangular areas, the number of pixels contained in one side of the square image being  $(2^N) + 1$  (where N is a natural number). For the reasons mentioned above with respect to claim 1, there is no motivation for combining Taubman and Bright because

Bright has no "quantization induced errors at tile boundaries" which require the methods taught by Taubman. Therefore, there is no motivation for using a tile size of  $(2^N) + 1$  as taught by Taubman in Bright, and therefore the rejection under 35 U.S.C. §103(a) is in error.

It is therefore respectfully requested that the rejection be withdrawn.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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JAO:JAR/tbm

Attachment:  
Replacement Drawing (1 sheet)

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